

Office of The Rt Hon Sir Mike Penning MP

Data Protection Policy

This document outlines how the Office of The Rt Hon Sir Mike Penning MP processes and manages personal data. It:

- 1) identifies our data controller;
- 2) provides our lawful basis for processing personal data;
- 3) outlines the scope of personal data we hold and process;
- 4) outlines the scope of the special category personal data we hold and process;
- 5) describes and justifies our data retention policy;
- 6) shows how we intend to respond to Subject Access Requests; and
- 7) contains a copy of our privacy notice.

The policies outlined within this document come into full effect on Friday 25th May 2018.

1. Data Controller

The Data Controller is The Rt Hon Sir Mike Penning MP.

2. Lawful basis for processing

- i. Casework is processed primarily under the lawful basis of public task, with exceptional cases processed under the lawful basis of consent.
- ii. Personal data contained in Sir Mike's mailing list is processed under the lawful basis of consent. It does not fall within the definition of direct marketing.
- iii. We undertake to always act within the reasonable expectations of our constituents and any other individuals about whom we hold personal data.
- iv. The Office has access to the full electoral register for the constituency which is processed under the lawful basis of public task.

3. Data we hold

Personal data is stored electronically and securely on our computer systems and paper records are stored in a locked filing cabinet system. Our systems are in offices which are locked when unattended and alarmed and monitored by CCTV.

Casework

The Office uses a CMS (Content Management System) application, CrossReference, specifically designed to help with the management of constituent casework records. This information predominantly includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- National Insurance Numbers, Passport Numbers.
- Special category data, outlined in point 4.

Policy

Policy casework is stored on the same CMS application. This information predominantly includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- Special category data on political beliefs.

Mailing lists

The Office also maintains a mailing list. These subscribers receive Sir Mike's regular newsletter. Personal data we hold in this regard includes:

- email addresses, names and postcode.

This information is not political in nature and therefore it is not categorised as direct marketing.

4. Special category data we hold

The office may also hold special category data for a smaller number of data subjects. This data will be processed under the lawful basis indicated in point two, as is permitted in clauses 23 and 24 of schedule 1 of the Data Protection Act. The data may include:

- Political opinions
- Religious beliefs
- Trade union activities
- Sexual orientation
- Race and ethnic origin
- Details of criminal offenses
- Physical and mental health

5. Data retention policy

Our office will hold personal data for the duration of Sir Mike's tenure as Member of Parliament for Hemel Hempstead.

6. Subject Access Requests

We will comply with Subject Access Requests in line with the guidance given by the Information Commissioners Office (ICO).

- i. We will respond as quickly as possible, within 30 calendar days.
- ii. We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- iii. Data subjects have the right to the following:
 - a. To be told whether any personal data is being processed
 - b. To be given a description of the personal data, the reasons it is being processed and whether it will be given to another organisations or people.
 - c. To be given a copy of the information comprising the data, and given details of the source of the data where this is available.

7. Privacy notice

Our office will undertake to ensure all constituents sharing their personal data can have the opportunity to read our privacy notice which can be found on Sir Mike's website at <https://www.pening4hemel.com/privacy>